

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

BAHRAM SHAKERI

Plaintiff

v.

PRINCE GEORGE’S COUNTY, MARYLAND

Defendant

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8:21-cv-00549-GJH

JOINT INITIAL STATUS REPORT

The Defendant, Prince George’s County, Maryland, and Plaintiff Bahram Shakeri by and through respective undersigned counsel, in accordance with the Scheduling Order submits this Joint Initial Status Report.

1. The parties do not believe that settlement is an option at this time and therefore the Parties do not believe that an early settlement/ADR conference would be helpful.
2. The parties do not consent to trial before a Magistrate Judge.
3. The parties do not intend to utilize discovery of electronically stored information.
4. The parties request the following modifications to the Scheduling Order.

Completion of Factual Discovery	January 31, 2023
Initial Expert Disclosures	February 24, 2023
Rebuttal Expert Disclosures	March 24, 2023
Completion of Expert Discovery. Submission of Status Report	April 21, 2023
Dispositive Pretrial Motion Deadline	May 19, 2023

Respectfully submitted,

RHONDA L. WEAVER
COUNTY ATTORNEY

ANDREW J. MURRAY
DEPUTY COUNTY ATTORNEY

By: TONIA G. BELTON-GOFPRED
Tonia Belton-Gofreed, Fed. Bar No. 16176
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Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20TH day of April 2022, a copy of the foregoing document was electronically transmitted to this Court and served via CM/ECF and email on:

Faisal Gill, Esq.
1717 Pennsylvania Avenue NW
Washington, DC 20006
Fgill@glawoffice.com
Counsel for Plaintiff

CONSENTED TO BY ALL PARTIES

/s/ Faisal Gill

/s/ TONIA G. BELTON-GOFREED
Tonia Belton-Gofreed, Fed. Bar No. 16176